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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities L.L.C.
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AMERICAN SECURITIES MANAGEMENT, L.P.,
formerly known as AMERICAN SECURITIES,
L.P., *et al.*

Defendants.

Adv. Pro. No. 10-05415 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND AND
ADJOURNMENT OF PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date by which the Defendants named in Exhibit A (each a “Defendant”, and collectively the “Defendants”) may move, answer, or otherwise respond to the amended complaint filed in the above-captioned adversary proceeding (the “Amended Complaint”) is extended up to and including January 16, 2015. The pre-trial conference shall be adjourned from December 17, 2014 to March 25, 2015 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Amended Complaint. Nothing in this stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move, or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that as of the date of this stipulation, all Defendants represented by the undersigned counsel in the adversary proceeding are alive or that counsel has previously provided notice to the Trustee in writing of Defendants’ death; (ii) expressly agrees to notify the Trustee in writing of the death of any Defendant within thirty (30) days of the date of such Defendant’s death, and to provide to the Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising

the Trustee whether a probate has or will be filed, (b) filing a stipulation substituting the deceased Defendant's estate or personal representative/executor and/or (c) advising the Trustee who will represent the deceased Defendant's estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 7037) in the above-captioned case (No. 08-01789 (SMB)).

Dated: October 10, 2014
New York, New York

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By: /s/ Jonathan B. New

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SIPA Liquidation of Bernard L. Madoff*

*Investment Securities LLC and the Estate of
Bernard L. Madoff*

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for Catherine L. Steinmann;
Catherine L. Steinmann;
Gabriel B. Steinmann;
Joshua Steinmann;
Jennifer E. Steinmann;
David P. Steinmann IRA Rollover #1 & #2;
David Steinmann Defined Benefit Plan;
David P. Steinmann Money Purchase Pension
Plan;
JJG Enterprises; and
1185 Park Avenue Foundation, Inc.*

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D. Klein Generation Skipping Trust DTD
7/31/01;
CDK Partners;
Nan M. Harman, as trustee of the Visalia Trust
UAD;
Reed L. Harman, as trustee of the Visalia Trust
UAD;
The Nan M. and Reed L. Harman Foundation;
Andrew B. Klein, individually, as beneficial
owner of one or more IRAs, as trustee and
beneficiary of the Charles D. Klein Generation
Skipping Trust DTD 7/31/01, as trustee of the
Andrew Klein Trust DTD 12/27/97, as trustee
of the Elizabeth Klein Trust DTD 12/27/97 and
as grantor and trustee of the Andrew B. Klein
1997 Trust DTD 5/15/97;
Charles D. Klein, individually, as beneficial
owner of one or more IRAs, as custodian
and/or trustee of the Charles D. Klein Money
Purchase Pension Plan, as beneficiary of the
Charles D. Klein Generation Skipping Trust*

DTD 7/31/01, as custodian and/or trustee of the Jane P. & Charles D. Klein Foundation, and as custodian and/or trustee of The Charles and Jane Klein Family Fund;
Elizabeth Klein, individually, as trustee and beneficiary of the Charles D. Klein Generation Skipping Trust DTD 7/31/01 and as trustee and beneficiary of the Elizabeth Klein Trust DTD 12/27/97;
Jane P. Klein, individually, as beneficial owner of an IRA, as custodian for Andrew B. Klein and Elizabeth Klein, as trustee of the Trust under will of Donald W. Parsons FBO Jane P. Klein, as trustee of the Elizabeth Klein Trust DTD 12/27/97, as trustee of the Charles D. Klein Generation Skipping Trust DTD 7/31/01, and as trustee of the Andrew Klein 1997 Trust DTD 5/15/97;
The Charles and Jane Klein Family Fund;
Klein Family Holdings, L.L.C.;
Jane P. Klein IRA;
Charles D. Klein IRA Rollover;
Charles D. Klein Money Purchase Pension Plan;
Joseph A. Rossetti, as beneficial owner of an IRA;
Joseph A. Rossetti IRA Rollover;
Susan C. Wolfe, as trustee of the Trust under will of Donald W. Parsons FBO Jane P. Klein;
Laila Hafner, as beneficial owner of an IRA;
Laila Hafner IRA;
Michael G. Fisch;
Michael G. Fisch IRA;
Michael G. Fisch Profit Sharing Plan;
Arlene Marie Pettingill;
Laura M. Roberson-Fisch, as beneficial owner of an IRA ;
Laura M. Roberson-Fisch Money Purchase; Pension Plan; and
Laura M. Roberson-Fisch Profit Sharing Plan.

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Goldstein 2007 Trust;
Joyce Goldstein IRA;
Neil B. Goldstein, individually, as beneficial
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Neil B. Goldstein 2007 Trust, and as
beneficiary of the Jean Weiner 1991 Grantor
Retained Annuity Trust;
Neil B. Goldstein IRA Rollover;
South Lake, L.L.C.; and
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Estate of Miriam Furst Ostow; and
Estate of Miriam Furst Ostow.

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*PJ Associates Group, L.P. DBA PJ
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On Behalf of pro se Defendant
Ivo Rothschild

By: /s/ Wallace Aptman

1654 Bridgewood Drive
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On Behalf of pro se Defendants
Wallace Aptman and
Wallace Aptman IRA Rollover Account

By: /s/ Joseph J. Nicholson

121 West 20th Street, Apt. #2A
New York, New York 10011
On Behalf of pro se Defendant
Joseph J. Nicholson individually and as Trustee
of the Joseph J. Nicholson Charitable
Remainder Unitrust

MILLER CANFIELD

By: /s/ Dean A. Dickie

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Nicholson Charitable Remainder Unitrust and
Barry F. Margolius as Trustee of the Joseph J.
Nicholson Charitable Remainder Unitrust.

**KORNSTEIN VEISZ WEXLER &
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American Securities Opportunity Fund, L.P.;
American Securities Holdings Corp.;
American Securities Group, L.L.C.;
AS Hirota Holdings Corp.;
Elizabeth R. Varet, individually, and as
custodian for Joseph R. Varet, as custodian
and/or Trustee of the Elizabeth R. Varet Money
Purchase Pension Plan, as grantor of the 2004
V Trust for Elizabeth R. Varet, as trustee of the
Apollo Trust for Alice R. Sigelman UAD
2/10/69, as trustee and beneficiary of the Apollo
Trust for Elizabeth R. Varet UAD 2/10/69, as
trustee of the Apollo Trust 2/10/69 FBO Nina
Rosenwald, as settlor of Michael A. Varet Trust
UAD 11/9/94, as settlor of the Trust 11/9/94 (A.
Anagnos et. al., Trustees), as trustee of the Issue
1 Trust UAD 8/30/41 FBO Nina Rosenwald, as
trustee of the Issue 1 Trust UAD 8/30/41 FBO

Alice Rosenwald, as trustee and beneficiary of the Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee of the Issue Trust 5 UAD 9/28/51 FBO Nina Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Alice Rosenwald, as trustee of the Issue Trust 5 UAD 9/28/51 FBO Benjamin R. Sigelman, as trustee of the Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman, as trustee of the Issue Trust 5 UAD 9/28/51 FBO David R. Varet, as beneficiary of the Issue Trust 5 UAD 9/28/51 FBO Elizabeth R. Varet, as trustee of the Issue Trust 5 UAD 9/28/51 FBO Joseph R. Varet, as trustee and Beneficiary of the Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of the Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald, as trustee of the Trust UAD 3/4/92 FBO Benjamin R. Sigelman, and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;
Stuart H. Coleman, as trustee of the Apollo Trust for Elizabeth R. Varet UAD 2/10/69, as trustee of the Apollo Trust 2/10/69 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee of Issue 1 Trust UAD 8/30/41 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Benjamin R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO David R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Alice Rosenwald and as trustee of Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald;
Ellen V. Greenspan, as trustee of the Trust 11/9/94 (A. Anagnos et. al., trustees); Alice Rosenwald a/k/a Alice Sigelman, individually, as custodian for Jonathan

*Sigelman, as custodian for Benjamin R.
Sigelman, as trustee and beneficiary of Issue 1
Trust UAD 8/30/41 FBO Alice Rosenwald, as
trustee and beneficiary of Issue Trust 6 UAD
8/13/65 FBO Alice Rosenwald, as trustee of the
Apollo Trust for Elizabeth R. Varet UAD
2/10/69, as trustee of the Apollo Trust 2/10/69
FBO Nina Rosenwald, as trustee of Issue 1
Trust UAD 8/30/41 FBO Nina Rosenwald, as
trustee of Issue 1 Trust UAD 8/30/41 FBO
Elizabeth R. Varet, as trustee of Issue Trust 5
UAD 9/28/51 FBO Jonathan R. Sigelman, as
trustee of Issue Trust 5 UAD 9/28/51 FBO
David R. Varet, as trustee of Issue Trust 5 UAD
9/28/51 FBO Elizabeth R. Varet, as trustee of
Issue Trust 5 UAD 9/28/51 FBO Sarah R. Varet,
as trustee of Issue Trust 6 UAD 8/13/65 FBO
Elizabeth R. Varet, as trustee of Issue Trust 6
UAD 8/13/65 FBO Nina Rosenwald and as
Executrix of the Estate of Jesse L. Sigelman;
Nina Rosenwald, individually, as trustee of the
Apollo Trust for Elizabeth R. Varet UAD
2/10/69, as trustee of Issue 1 Trust UAD 8/30/41
FBO Alice Rosenwald, as trustee of Issue 1
Trust UAD 8/30/41 FBO Elizabeth R. Varet, as
trustee of Issue Trust 5 UAD 9/28/51 FBO
Benjamin R. Sigelman, as trustee of Issue Trust
6 UAD 8/13/65 FBO Elizabeth R. Varet, as
trustee of Issue Trust 6 UAD 8/13/65 FBO Alice
Rosenwald, as trustee of Issue Trust 5 UAD
9/28/51 FBO Alice Rosenwald, as trustee and
beneficiary of the Apollo Trust 2/10/69 FBO
Nina Rosenwald, as trustee and beneficiary of
Issue 1 Trust UAD 8/30/41 FBO Nina
Rosenwald, as trustee and beneficiary of Issue
Trust 5 UAD 9/28/51 FBO Nina Rosenwald and
as trustee and beneficiary of Issue Trust 6 UAD
8/13/65 FBO Nina Rosenwald;
Benjamin R. Sigelman, individually, as
beneficiary of the Issue Trust 5 UAD 9/28/51
FBO Benjamin R. Sigelman, and as beneficiary
of the Trust UAD 3/4/92 FBO Benjamin R.
Sigelman;
Jonathan R. Sigelman, individually, and as
beneficiary of the Issue Trust 5 UAD 9/28/51
FBO Jonathan R. Sigelman, as beneficiary of*

the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;
The Estate of Jesse L. Sigelman;
David R. Varet;
Joseph R. Varet, individually, and as beneficiary of the Issue Trust 5 UAD 9/28/51 FBO Joseph R. Varet;
Michael A. Varet, individually, as beneficial owner of one or more IRAs, as custodian for David R. Varet and Sarah R. Varet, and as trustee of the Michael A. Varet Trust UAD 11/9/94;
Sarah R. Varet, individually and as trustee and beneficiary of the Issue Trust 5 UAD 9/28/51 FBO Sarah R. Varet;
Elizabeth R. Varet IRA Rollover;
Michael A. Varet IRA Rollover;
Michael A. Varet IRA Rollover #2;
Elizabeth R. Varet Defined Benefit Plan & Trust;
Elizabeth R. Varet Money Purchase Pension Plan;
Decimal Investments, L.L.C.;
Hudson Charitable Fund;
P&I Partners;
The Abstraction Fund;
American Philanthropic Foundation;
Anchorage Charitable Fund;
JJG Foundation, Inc.;
Metropolitan Philanthropic Fund, Inc.
Alice Rosenwald Fund;
William Rosenwald Family Fund, Inc.;
James R. Ledley, as trustee of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;
Alexander G. Anagnos as trustee of the 2004 V Trust and as trustee of Trust 11/9/94 (A. Anagnos et al., trustees);
Ronald Stein as trustee of the Trust UAD 3/4/92 FBO Benjamin R. Sigelman and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;
Belinda Clarke, as trustee for the Concorde 1987 Trust DTD 12/9/87; and
Peter Pearman, as trustee for the Concorde 1987 Trust DTD 12/9/87.

Defendants

1185 Park Avenue Foundation, Inc.
Abe Mastbaum
Abe Mastbaum IRA
Abe Mastbaum IRA Rollover
Abe Mastbaum IRA SEP
Abstraction Fund
Alexander G. Anagnos, as trustee
Alice Rosenwald a/k/a Alice R. Sigelman
Alice Rosenwald Fund
American Philanthropic Foundation
American Securities Group, L.L.C.
American Securities Holdings Corp.
American Securities Management, L.P., f/k/a American Securities, L.P.
American Securities Opportunity Fund, L.P.
Anchorage Charitable Fund
Andrew B. Klein
Anthony R. Grillo, as trustee
Arlene Marie Pettingill
AS Hirota Holdings Corp.
Barry F. Margolius, as trustee
Belinda Clarke, as trustee
Benjamin E. Nickoll, as trustee
Benjamin R. Sigelman
Catherine L. Steinmann
CDK Partners
Charles D. Klein
Charles D. Klein IRA Rollover
Charles D. Klein Money Purchase Pension Plan
Darmel Management, L.L.C.
David P. Steinmann
David P. Steinmann IRA Rollover #1
David P. Steinmann IRA Rollover #2
David P. Steinmann Money Purchase Pension Plan
David R. Varet
David Steinmann Defined Benefit Plan
Decimal Investments, L.L.C.
Elizabeth Klein
Elizabeth R. Varet
Elizabeth R. Varet Defined Benefit Plan & Trust
Elizabeth R. Varet IRA Rollover
Elizabeth Varet Money Purchase Pension Plan
Ellen V. Greenspan, as trustee

Defendants

Estate of Jesse L. Sigelman
Estate of Miriam Furst-Ostow
Gabriel B. Steinmann
George Anagnos
Hudson Charitable Fund
Ivo Rothschild
James R. Ledley, as trustee
Jane P. Klein
Jane P. Klein IRA
Jason Mastbaum
Jennifer E. Steinmann
JJG Enterprises
JJG Foundation, Inc.
Jonathan R. Sigelman
Joseph A. Rossetti IRA Rollover
Joseph A. Rossetti, as beneficial owner of an IRA
Joseph J. Nicholson
Joseph R. Varet
Josephine G. Anagnos
Joshua Steinmann
Joyce W. Goldstein
Joyce W. Goldstein IRA
Judy Steinberg Kovler
Klein Family Holdings, L.L.C.
Laila Hafner IRA
Laila Hafner, as beneficial owner of an IRA
Laura M. Roberson-Fisch IRA
Laura M. Roberson-Fisch Money Purchase Pension Plan
Laura M. Roberson-Fisch Profit Sharing Plan
Laura M. Roberson-Fisch, as beneficial owner of an IRA
Laurence Ach, as trustee
Maria Anagnos-Pierce
Metropolitan Philanthropic Fund, Inc.
Michael A. Varet
Michael A. Varet IRA Rollover
Michael A. Varet IRA Rollover #2
Michael G. Fisch
Michael G. Fisch IRA
Michael G. Fisch Profit Sharing Plan
Minor #1
Nan M. Harman, as trustee
Neil B. Goldstein

Defendants

Neil B. Goldstein IRA Rollover

Nina Rosenwald

P&I Partners

Peter Pearman, as trustee

PJ Administrator, L.L.C.

PJ Associates Group GP Corp.

PJ Associates Group, L.P.

Rachael Ostow Lustbader, as executrix

Reed L. Harman, as trustee

Ronald J. Stein, as trustee

Sarah R. Varet

South Lake, L.L.C.

Steven Anagnos

Stuart H. Coleman, as trustee

Susan C. Wolfe, as trustee

The Charles and Jane Klein Family Fund

The Reed L. Harman and Nan M. Harman Foundation

Wallace Aptman

Wallace Aptman IRA Rollover

William Rosenwald Family Fund, Inc.